

Michael J. Quinn

Direct Dial Number
580-2068

October 12, 1994

Ms. Linda Beasley
Enforcement Specialist
U.S. EPA - Region V
Emergency Support Section HSE-5J
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: Conservation Chemical Company of Illinois, Inc., Site, Gary, Indiana (the "Site")

Dear Ms. Beasley:

I am writing to respond to a general notice letter regarding the Site from Richard C. Karl of your office addressed to W.H. Maze Company. The general notice letter identifies W.H. Maze as a potentially responsible party ("PRP") for hazardous substances allegedly found at the Site. According to the information provided by you in our telephone conversation, W.H. Maze is alleged to have sent to the Site 6,926 gallons of waste, or .0246% of the total volume of waste shipped to the Site. Thus, W.H. Maze is, at most, a de minimis contributor to the Site.

In response to the general notice letter, W.H. Maze is generally willing to pay its pro rata share of cleanup costs at the Site, assuming that the shipment of wastes to the Site by W.H. Maze can be confirmed. Further, if a de minimis settlement is offered, W.H. Maze will probably be willing to accept a settlement that includes a reasonable premium for settling parties. However, due to the minute share of the waste allegedly contributed by W.H. Maze, the company is unable to take a lead role in negotiating with you in this matter.

W.H. Maze will have a representative at the "kick off" meeting, and we would be interested in joining a group of PRPs negotiating with you regarding the Site.

D'ANCONA & PFLAUM

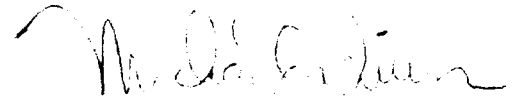
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For your information, **W.H. Maze** was a defendant in the matter entitled **6500 Industrial Highway Group v. K.A. Steel**, No. H89-0282, in the U.S. District Court for the Northern District of Indiana, which involved claims among PRPs regarding the Site. This litigation was settled **some time ago**.

Future correspondence **regarding** this matter may be addressed to me.

Please call me if your **have any** questions or comments.

Sincerely Yours,

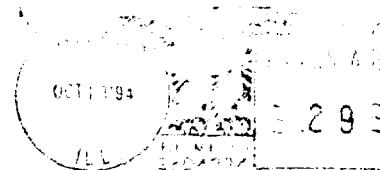


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